

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 23cr10293
)	
v.)	Violations:
)	
TRAMONTE JAMIER QUEEN,)	<u>Count One</u> : Sex Trafficking of a Child
)	(18 U.S.C. §§ 1591(a)(1), (b)(2) and (c))
)	
Defendant)	<u>Count Two</u> : Transportation of a Minor with
)	Intent to Engage in Criminal Sexual Activity
)	(18 U.S.C. § 2423(a))
)	
)	<u>Sex Trafficking Forfeiture Allegation</u> :
)	(18 U.S.C. § 1594(d) and
)	28 U.S.C. § 2461)
)	
)	<u>Transportation Forfeiture Allegation</u> :
)	(18 U.S.C. §§ 981(a)(1)(C), 2428(a) and 28
)	U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Sex Trafficking of a Child
(18 U.S.C. §§ 1591(a)(1), (b)(2), and (c))

The Grand Jury charges:

From in or around January 2022 and continuing to on or about February 5, 2022, in Boston, the District of Massachusetts, the District of Rhode Island, the District of Connecticut, and elsewhere, the defendant,

TRAMONTE JAMIER QUEEN,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain and solicit by any means Victim 1, a person known to the

Grand Jury who had not attained the age of 18 years, having had a reasonable opportunity to observe Victim 1, and knowing and, except where advertising, in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT TWO

Transportation of a Minor with Intent to Engage in Criminal Sexual Activity
(18 U.S.C. § 2423(a))

The Grand Jury further charges:

Between on or about February 1, 2022, and on or about February 5, 2022, in the District of Massachusetts, the District of Rhode Island, and elsewhere, the defendant,

TRAMONTE JAMIER QUEEN,

did knowingly transport Victim 1, a person known to the Grand Jury who had not attained the age of 18 years, in interstate commerce, that is, between Massachusetts and Rhode Island, with the intent that Victim 1 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

SEX TRAFFICKING FORFEITURE ALLEGATION
(18 U.S.C. § 1594(d) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1591, set forth in Count One, the defendant,

TRAMONTE JAMIER QUEEN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), and Title 28, United States Code, Section 2461(c), the defendant's interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offense, and any property traceable to such property.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 1594(d) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 1594(d), and Title 28, United States Code, Section 2461(c).

TRANSPORTATION FORFEITURE ALLEGATION
(18 U.S.C. §§ 981(a)(1)(C), 2428(a) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2423, set forth in Count Two, the defendant,

TRAMONTE JAMIER QUEEN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), and Title 28, United States Code, Section 2461(c), the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a)(2), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offense.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 2428(a), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant—

- f. cannot be located upon the exercise of due diligence;
- g. has been transferred or sold to, or deposited with, a third party;
- h. has been placed beyond the jurisdiction of the Court;
- i. has been substantially diminished in value; or
- j. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a), and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON



BRIAN A. FOGERTY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: November 14, 2023
Returned into the District Court by the Grand Jurors and filed.



11/14/2023
DEPUTY CLERK